

MEMO ENDORSED

LAW OFFICES  
**PAULA J. NOTARI**  
315 MADISON AVENUE  
SUITE 901  
NEW YORK, NEW YORK 10017

Tel. (646) 943-2172

JUL 27 2017

July 26, 2017

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Jason Galanis et al  
16-cr-0371-4 (RA)

Dear Judge Abrams:

Application granted. Pending the resolution of Mr. Cooney's motion, all defendants and their counsel (other than Mr. Cooney and his counsel) shall refrain from accessing, reviewing, or disclosing any materials that were produced by the Government and that come from e-mail accounts associated with Mr. Cooney. SO ORDERED.

Ronnie Abrams, U.S.D.J.

July 27, 2017

We represent Bevan Cooney, one of the defendants in above-referenced case. We write to join, so far as applicable to defendant Bevan Cooney, the Emergency Letter Motion made by counsel representing Devon Archer on July 26, 2017 (Dkt. 191). Upon information and belief we believe that the Government just as in the case of Mr. Archer, has similarly produced to all defendants in this case the entire contents of Mr. Cooney's e-mail account, save certain documents that the government has segregated for privilege review. Based on the correspondence Mr. Archer's attorney has filed in connection with his motion, the Government has acknowledged in their email with Mr. Archer's attorney, that they have treated all five email accounts which includes Mr. Cooney's e-mail account in the same manner. Counsel for Mr. Cooney during the past week received a copy of the most recent discovery production on a hard drive which we have not yet had the opportunity to review.

Given the Court's Order late this evening, we hereby notify the Court and the Government that we intend to join Mr. Archer's emergency motion shortly and ask that the Court Order all defendant and their counsel (other than Mr. Cooney and his counsel) shall refrain from accessing and reviewing, or disclosing any materials that were produced by the Government and that come from email accounts associated with Mr. Cooney. Thank you for your consideration.

Respectfully submitted,

/S/

Paula J. Notari  
Abraham Hassen  
Attorneys for Bevan Cooney

cc: (via ECF & email) AUSAs Brian Blais, Rebecca Mermelstein, Aimee Hector and Andrea Griswold